

1 Through their undersigned counsel, Defendants Google LLC and YouTube, LLC and
2 Plaintiffs (the Parties) do hereby agree and stipulate as follows:

3 **A. Stipulation Regarding Resolution of the Parties Dispute Concerning YouTube's**
4 **Production from Source L.**

5 1. WHEREAS, the Parties previously agreed to extend the deadline to brief the
6 deficiency dispute for the L source to May 30, 2025, and the Court granted the Parties' requested
7 schedule, Dkt. 1989;

8 2. WHEREAS, the Parties continued to meet and confer to reach resolution on the
9 dispute related to the L source and have reached agreement;

10 3. NOW THEREFORE, the Parties hereby agree that the dispute as to the L source
11 has been resolved without the need for court intervention, as follows:

- 12 a. YouTube will provide certain agreed-upon documents related to the new search
13 of the L Source using Plaintiffs' terms by June 11, 2025.
 - 14 b. YouTube will complete the new search and production from the L source by
15 June 18, 2025, subject to the parties' timely agreement to a new search
16 methodology for this source.
 - 17 c. Plaintiffs may take limited additional fact witness deposition testimony subject
18 to the terms of the parties' agreement, to be completed by July 16, 2025.
 - 19 d. YouTube may incorporate its completed productions from L Source and the
20 related fact witness depositions in its Responsive Reports for Non-Case-
21 Specific and Causation Experts due on July 9, 2025.
 - 22 e. A limited agreed-upon number of Plaintiffs' experts may amend their reports to
23 address or incorporate the productions from L Source and the testimony from
24 the related fact witnesses subject to the parties agreed-upon scope. Plaintiffs'
25 expert report amendments, if any, will be incorporated into Plaintiffs' Rebuttal
26 Reports for Non-Case-Specific and Causation Experts, to be completed by July
27 30, 2025.
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1 f. Except as to the agreements incorporated herein, Plaintiffs agree not to seek
2 additional discovery or other relief with respect to the L Source.

3 **B. Stipulation Regarding Briefing Concerning the Production of Documents from**
4 **Source M**

5 1. WHEREAS, the Parties previously agreed to brief any deficiency dispute for the M
6 source by June 6, 2025, (fifteen (15) business days after May 15), and the Court granted the Parties'
7 requested schedule, Dkt. 1861; and

8 2. WHEREAS, the Parties are continuing to meet and confer to reach resolution on
9 the dispute related to this source;

10 3. NOW, THEREFORE, the Parties hereby jointly stipulate and request that the Court
11 approve the Parties' proposed briefing schedule extension such that any brief will be submitted on
12 June 27, 2025.

13 **C. Stipulation Regarding Briefing Concerning the Parties' Stipulation Concerning**
14 **the Authenticity and Admissibility of YouTube's Productions from Non-**
15 **Custodial Sources**

16 1. WHEREAS, the Parties previously agreed to brief any dispute concerning the
17 Parties' stipulation regarding the authenticity and admissibility of YouTube's productions from
18 the F Source, L Source, A Source, B Source, and M Source to be briefed as a part of any Joint
19 Letter Brief contemplated in regard to disputes concerning these sources, and the Court granted
20 the Parties' requested schedule, Dkt. 1861; and

21 2. WHEREAS, the Parties are continuing to meet and confer to reach resolution on
22 disputes and searches related to the sources at issue, and accordingly, the Parties' stipulation
23 regarding the authenticity and admissibility of YouTube's productions therefrom;

24 3. NOW, THEREFORE, the Parties hereby jointly stipulate and request that the Court
25 approve the Parties' proposed briefing schedule extension such that any brief will be submitted on
26 June 27, 2025.

27 **IT IS SO STIPULATED**, through Counsel of Record.

28 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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Dated: _____

Honorable Peter H. Kang
United States District Judge

Dated: June 6, 2025

Respectfully submitted,

**WILSON SONSINI GOODRICH & ROSATI
Professional Corporation**

/s/ Christopher Chiou

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23 Dated: June 6, 2025

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ATTESTATION

I, Audrey Siegel hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: June 6, 2025

/s/ Audrey Siegel

Audrey Siegel